

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 29 1993

FCC - MAIL ROOM

In the Matter of)
Amendment of Part 90 of the)
Commission's Rule to Adopt)
Regulations for Automatic)
Vehicle Monitoring Systems)

93-61 /
PR Docket No. 93-061
RM 8013

To: The Commission

COMMENTS ON NOTICE OF PROPOSED RULEMAKING

The Port Authority of New York and New Jersey (the "Port Authority") is a body corporate and politic established by compact between the states of New Jersey and New York with the consent of the Congress of the United States. It operates Kennedy and Newark International and La Guardia Airports, the World Trade Center in Manhattan and the Holland and Lincoln Tunnels and the George Washington Bridge as well as a number of other transportation facilities in the New York Metropolitan Area.

The Port Authority wishes to bring to the attention of the Federal Communications Commission ("FCC") certain matters concerning existing Port Authority operations in connection with the FCC's consideration of the above captioned matter in addition

the New York State Thruway Authority, the Pennsylvania Turnpike Commission, the South Jersey Transportation Authority, the Triborough Bridge and Tunnel Authority and the Port Authority, with regard to the "E-ZPass Plan". This plan calls for the eventual implementation of electronic toll collection on the tunnels, bridges and highways operated by its members.

These existing Port Authority operations consist of several smaller electronic tolls and traffic management ("ETTM") systems. These systems are important to the smooth functioning of daily operations at our facilities.

(1) A so-called "narrow band" ETTM System at the Lincoln Tunnel which reads tags sold to commuter bus operators who may thus avoid stopping at a toll booth. The system serves some 55,000 daily commuter bus passengers. The system is licensed under a license bearing call sign WNNV601 at 905 and 910 MHz. These are frequencies which would be limited to so-called "wide band" use under the FCC's proposed Regulations.

(2) A so-called "narrow band" ETTM system at Kennedy International Airport used to locate and dispatch buses which operate among the various Airport terminals and the parking lots. This system is licensed under a license bearing call sign WNYH342 at 904.01, 908, 910, 911.99, 918.01, 920, 922 and 925.99 MHz. These are frequencies which would be limited to so-called "wide band" use under

the FCC's proposed Regulations.

(3) An entry tag system used to control access to and the security of the employee parking lot at Kennedy International Airport which is type certified under Part 15 of the FCC's rules with no license required.

In addition to the E-ZPass Plan the Port Authority is giving detailed consideration to the implementation of additional ETSM systems at our Airports for the control of vehicular access to the aeronautical areas and for the management of taxicabs and other categories of commercial vehicles.

We believe the FCC should be mindful of several matters as it formulates its Automatic Vehicle Monitoring Systems Regulations:

(1) Special consideration should be given to assuring the successful continued implementation of existing so-called "narrow band" systems such as those described above, if the FCC should determine that the frequencies to be used must be changed. In particular, preference should be given to state and local government agencies for the grant of licenses for the spectrum necessary for successful continued operation of systems which need a substantial number of frequencies due to the large areas being covered; i.e. Kennedy International Airport.

(2) A licensing scheme which permits the phased implementation of these systems by a state and local government agencies should be developed. Limited funding and operational

requirements often make it desirable to install systems of this type at a limited number of locations at an Airport or toll plaza with expansion to follow over a number of years. FCC requirements for the rapid utilization of all planned frequencies makes such an approach difficult or impossible.

Respectfully Submitted,

THE PORT AUTHORITY OF
NEW YORK AND NEW JERSEY

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